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May 16, 2003

Cheryl Kimball, Esq. Keegan, Werlin & Pabian 21 Custom House St. Boston, Mass. 02110

RE: Boston Gas Co. general rate case, DTE 03-40

Dear Ms. Kimball:

Here is the first set of Data Requests by MASSCAP:

- 1. Please provide the company's and parent company's 2001 and 2002 Annual Reports to the FERC (Form 2).
- 2. Please provide the company's 2001 and 2002 and parent company's Annual Reports to the DTE.
- 3. Please provide the company's 2001 and 2002 and parent company's Annual Reports to the SEC (10-K), and last two proxy statements.
- 4. Please provide average gas commodity prices for each of the past 25 years, as follows:
 - a. separately for Company supplies for storage, peaking, and all other (differentiating the latter between summer and winter),
 - b. national wellhead.
- 5. Please provide purchased each gas adjustment clause amount over the past 25 years, by rate class.
- 6. Please provide an aging of Company (a) residential and (b) low-income accounts receivable (30 days, 60, 90, 120+), on average for each of the last five years.
- 7. Please provide a copy of the Company's last approved forecast and supply plan.
- 8. Please describe the terms (durations) available for physical purchases of all types.
- 9. Please describe the Company's current commodity purchasing strategy.

- 10. Please provide a summary of all gas purchase contracts now in force, including seller, beginning and end dates, price or index (including all terms of the index and the frequency with which it is used).
- 11. Please explain in detail the possible operation of a commodity price stabilization plan. Please list all the portfolio tactics that would be employed in a commodity price stabilization plan. Please describe the terms of a stability plan, if any, that the Company is willing to provide to its residential ratepayers.
- 12. Please provide the data provided to ICF for the avoided cost study.
- 13. To the extent you have not already done so, please provide copies of all data responses to others in this docket.

Thank you.

Sincerely,

cc:

Mary Cottrell, Secretary, DTE Jeanne Voveris, Hearing Officer Alex Cochis, Tim Newhard, AG James+ Avery, Berkshire Gas